

2809

**RESPONSE TO OHIO EPA COMMENTS OF
DECEMBER 13, 1992 ON THE EXPERIMENTAL
TREATMENT FACILITY WORK PLAN,
CONSTRUCTION/MAINTENANCE WASTE
HANDLING PROCEDURES**

XX-XX-XX

RESPONSE TO OHIO EPA COMMENTS OF DECEMBER 13, 1992
ON
THE EXPERIMENTAL TREATMENT FACILITY WORK PLAN,
CONSTRUCTION/MAINTENANCE WASTE HANDLING PROCEDURES

COMMENT #9 Construction/Maintenance Waste Handling Procedures, Doc. No. IN-6031, Section 6.): DOE should be very conservative in its allowance for the site soils to be used as backfill, especially in uncontrolled areas. The OU1 and OU4 Treatability Study Work Plans include a statement of a remedial action objectives of 5 and 15 pCi/g for thorium, therefore soil with thorium levels ≤ 10 pCi/g should not be released for unrestricted use within the FEMP. It makes no sense for DOE to further spread soil which they know will have to be remediated at a later date. All soils meeting or exceeding these proposed remedial action objective level(s) should be stockpiled. The stockpiles should be maintained in a manner to prevent erosion and incorporated into the Improved Storage of Soil and Debris Removal Action #17

RESPONSE Section 6.1 of IN-6031 requires clarification. Current practice at the FEMP allows soil that is within the limits of Category 1 to be used as backfill within the project from which it was generated. Although the procedure seems to indicate otherwise, Category 1 soil is not released for unrestricted use throughout the FEMP. Section 6.1 of IN-6031 will be revised to clarify this issue.

COMMENT #10 Construction/Maintenance Waste Handling Procedures: In the definition of construction waste in procedures IN-6031 and IN-6033, both "RCRA waste" and "hazardous waste" are included. Explain the difference between these wastes.

RESPONSE The term "hazardous waste" was incorrectly utilized in both cases. Both procedures, IN-6031 and IN-6033, have been revised by replacing the words "hazardous waste" with the words "hazardous materials."

COMMENT #11 Construction/Maintenance Waste Handling Procedures: These procedures fail to include any mechanism for determining if these materials are considered a solid waste under Ohio law. DOE should incorporate a solid waste determination within the procedures.

RESPONSE The determination of a material being a waste, a solid waste, or a hazardous waste is made during the waste characterization process. Once a material is determined to be a waste, then it is further characterized as solid waste or hazardous waste, as defined by Ohio law. It is in the waste characterization portion of The Construction/Maintenance Waste Handling Procedures that the solid waste determination is made.